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MGM Grand Hotel, LLC and Defendant
MGM Resorts International*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DWIGHT MANLEY,

Plaintiff,

v.

MGM RESORTS INTERNATIONAL; MGM
GRAND HOTEL, LLC,

Defendants.

MGM GRAND HOTEL, LLC, a Nevada
limited liability company,

Counterclaimant,

v.

DWIGHT MANLEY, an individual,

Counter-Defendant.

Case No. 2:22-cv-01906-MMD-EJY

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION AND
JOINT PRE-TRIAL MEMO
DEADLINES AND STATUS REPORT
REGARDING DISCOVERY**

(Fourth Request)

Pursuant to LR IA 6-1 and 6-2, Plaintiff/Counter-Defendant Dwight Manley ("Plaintiff"), Defendant/Counterclaimant MGM Grand Hotel, LLC and Defendant MGM Resorts International (together, "Defendants"), hereby submit this Stipulation to Extend the Dispositive Motion and

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Joint Pre-Trial Memo Deadlines (Fourth Request) and Status Report Regarding Discovery.

The discovery deadline in this matter expired on September 30, 2024. Prior to the close of discovery, the parties discussed an extension of 60 days. That discussion took place in the context of Defendants not knowing how quickly they could gather, review and produce prior incident reports consistent with the Court's ruling on Plaintiff's Motion to Compel and Defendants' corresponding Motion for Protective Order. (*See* ECF No. 65 and ECF No. 94.) Thereafter, on September 27, 2024, Defendants produced prior incident reports. Counsel for Plaintiff did not have an opportunity to review those reports prior to the September 30, 2024 discovery deadline.

While both parties acknowledge that certain discovery remains outstanding, they have yet to reach an agreement regarding an extension of the discovery deadline. Counsel for Plaintiff wishes to extend the discovery deadline without limitations as to the scope of discovery during that period. Defendants' counsel, however, is unwilling to agree to a blanket extension without certain parameters and/or limitations on the remaining discovery to be conducted in this case. As such, the parties are still engaged in good faith discussions as to what discovery remains to be completed in this case and/or whether such discovery is appropriate.

Within two weeks from the date of this Stipulation, the parties will notify the Court either by way of status report or further stipulation concerning the agreed to (and/or disputed) parameters for completing discovery in this case, as well as a proposed discovery cut-off date.

Considering the foregoing, the parties seek a sixty (60) day extension of the current dispositive motion and pre-trial deadlines. The foregoing extension will provide the parties with sufficient time prior to the filing of dispositive motions to resolve the foregoing discovery issues and/or seek Court intervention if necessary. Specifically, the parties propose the following schedule:

	<u>Current</u>	<u>Proposed</u>
Deadline to file dispositive motions	October 30, 2024	December 30, 2024
Joint Pretrial Order	November 29, 2024	January 31, 2025

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This Stipulation is made in good faith and not for purposes of delay.

DATED this 1st day of October 2024.

DATED this 1st day of October 2024.

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PRHLAW LLC

/s/ Katie L. Cannata

/s/ Paul R. Hejmanowski

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MGM Grand Hotel, LLC & Defendant MGM

Dwight Manley

Resorts International

IT IS SO ORDERED.


United States Magistrate Judge

DATED: October 1, 2024

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